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Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS AND AD HOC GROUP OF
SUBROGATION CLAIM HOLDERS
EXTENDING TIME TO RESPOND TO
MOTION OF THE AD HOC COMMITTEE
OF SENIOR UNSECURED NOTEHOLDERS
TO TERMINATE THE DEBTORS'
EXCLUSIVE PERIODS PURSUANT TO
SECTION 1121(d)(1) OF THE BANKRUPTCY
CODE**

Re: Dkt. No. 2741

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and
3 Electric Company (the “**Ad Hoc Committee**”), on the one hand, and the Ad Hoc Group of
4 Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”), on the other hand. The Ad
5 Hoc Committee and the Ad Hoc Subrogation Group are referred to in this Stipulation and
6 Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby
7 stipulate and agree as follows:

8 **RECITALS**

9 A. On June 25, 2019, the Ad Hoc Committee filed the *Motion of the Ad Hoc*
10 *Committee of Senior Unsecured Noteholders to Terminate the Debtors’ Exclusive Periods*
11 *Pursuant to Section 1121(d)(1) of the Bankruptcy Code* [Dkt. No. 2741] (the “**Motion to**
12 **Terminate Exclusivity**”), which is set for a hearing before the Court at 9:30 a.m. on July 24,
13 2019. The *Notice of Hearing on Motion of the Ad Hoc Committee of Senior Unsecured*
14 *Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to Section 1121(d)(1) of the*
15 *Bankruptcy Code* [Dkt. No. 2744] (the “**Notice**”) states that any response or objection is to be
16 filed “so as to be received by no later than 4:00 p.m. (Pacific Time) on July 16, 2019.”

17 B. Counsel for the Ad Hoc Committee and counsel for the Ad Hoc Subrogation
18 Group have agreed that the time for the Ad Hoc Subrogation Group to respond to the Motion to
19 Terminate Exclusivity should be extended.

20 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
21 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
22 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
23 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
24 **THAT:**

25 1. The time for the Ad Hoc Subrogation Group to file and serve any response or
26 opposition to the Motion to Terminate Exclusivity is extended through 4:00 p.m. (Pacific Time)
27 on July 18, 2019.
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Dated: July 11, 2019

AKIN GUMP STRAUSS HAUER &
FELD LLP

/s/ Ashley Vinson Crawford

Ashley Vinson Crawford

*Attorneys for the Ad Hoc Committee of
Senior Unsecured Noteholders*

Dated: July 11, 2019

DIEMER & WEI LLP

/s/ Kathryn S. Diemer

Kathryn S. Diemer

*Attorneys for Ad Hoc Group of Subrogation
Claim Holders*